



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

JUN 30 2003

Certified Mail 7001 0360 0000 3639 6631
Certified Receipt Requested

In reply, refer to WST-3

WARNING LETTER

Earl Clinkenbeard, PE
Engineering Specialist
Pechiney Cast Plate
P.O. Box 58447
Vernon, CA 90058

Dear Mr. Clinkenbeard:

On March 26-27, 2003, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency ("EPA") at Pechiney Cast Plate, located at 3200 Fruitland Avenue, Vernon, California, EPA Identification Number CAR 000 052 142. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), as amended [42 U.S.C. 6927]. A copy of the investigation report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with RCRA regulations and potential violations of the California authorized program under RCRA Subtitle C. Any omissions in the report shall not be construed as a determination of compliance with all applicable regulations.

Pursuant to Section 3008 of RCRA [42 U.S.C. 6928] you are required to:

1. Submit a written Standard Operating Procedure that ensures that all containers that hold hazardous waste, both in satellite accumulation areas and 90-day storage areas, are labeled or marked clearly with the accumulation start date, the words "Hazardous Waste", the composition and physical state of the waste, the particular hazardous properties of the waste, and the name and address of the person producing the waste, as required by §66262.34(f). Certify that all hazardous waste containers at your facility are properly labeled.
2. Certify that all containers of hazardous waste are kept closed, except when it is necessary to add or remove waste, as required by §66265.173(a).
3. Certify that the 55-gallon drum containing mineral spirits, paint, and water has been shipped offsite.

Your response must include a letter signed by a duly authorized official of your facility, certifying correction of the identified areas of noncompliance. Documentation of your return to compliance may consist of, among other things, photographs, manifests and revised records. Where compliance cannot be achieved within 30 days from the date of this letter, you must provide to EPA the reasons for the delay, a description of each corrective action planned and a schedule on which each corrective action will be taken.

By copy of this letter, EPA is providing the State of California with notice of the referenced violations of Subtitle C of RCRA. EPA is also providing the State with notice that EPA may take appropriate enforcement action if the facility does not resolve the violations within the time specified above, and the State does not take appropriate enforcement action. The State of California may notify EPA of its intent to assume or decline responsibility to take such action to resolve the referenced violations.

EPA reserves the right to take further enforcement action as it deems appropriate. However, your response to this letter will be considered in determining the need for further enforcement action. Violations of Subtitle C of RCRA such as those listed in the enclosed report may be punishable by civil and criminal actions, including penalties of up to \$27,500 per day for each violation as provided by Section 3008 of RCRA.

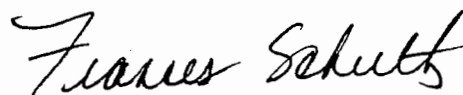
EPA routinely provides copies of investigation reports to state agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fourteen (14) calendar days from the date of this letter. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

Your response to this Warning Letter, due within 30 calendar days from the date of this letter, shall be mailed to:

Robin Holloway, WST-3
RCRA Enforcement Office
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

If you have questions related to technical aspects of the investigation report or this letter, please contact Robin Holloway at (415) 972-3305.

Sincerely,



Frances Schultz, Manager
RCRA Enforcement Office

Enclosure

cc w/o enclosure:

Charles McLaughlin, Branch Chief, State Regulatory Programs Division
Department of Toxic Substances Control
8800 Cal Center Dr.
Sacramento, CA 95828-3200



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

File

JUN 30 2003

Certified Mail 7001 0360 0000 3639 6631
Certified Receipt Requested

In reply, refer to WST-3

WARNING LETTER

Earl Clinkenbeard, PE
Engineering Specialist
Pechiney Cast Plate
P.O. Box 58447
Vernon, CA 90058

Dear Mr. Clinkenbeard:

On March 26-27, 2003, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency ("EPA") at Pechiney Cast Plate, located at 3200 Fruitland Avenue, Vernon, California, EPA Identification Number CAR 000 052 142. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), as amended [42 U.S.C. 6927]. A copy of the investigation report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with RCRA regulations and potential violations of the California authorized program under RCRA Subtitle C. Any omissions in the report shall not be construed as a determination of compliance with all applicable regulations.

Pursuant to Section 3008 of RCRA [42 U.S.C. 6928] you are required to:

1. Submit a written Standard Operating Procedure that ensures that all containers that hold hazardous waste, both in satellite accumulation areas and 90-day storage areas, are labeled or marked clearly with the accumulation start date, the words "Hazardous Waste", the composition and physical state of the waste, the particular hazardous properties of the waste, and the name and address of the person producing the waste, as required by §66262.34(f). Certify that all hazardous waste containers at your facility are properly labeled.
2. Certify that all containers of hazardous waste are kept closed, except when it is necessary to add or remove waste, as required by §66265.173(a).
3. Certify that the 55-gallon drum containing mineral spirits, paint, and water has been shipped offsite.

Your response must include a letter signed by a duly authorized official of your facility, certifying correction of the identified areas of noncompliance. Documentation of your return to compliance may consist of, among other things, photographs, manifests and revised records. Where compliance cannot be achieved within 30 days from the date of this letter, you must provide to EPA the reasons for the delay, a description of each corrective action planned and a schedule on which each corrective action will be taken.

By copy of this letter, EPA is providing the State of California with notice of the referenced violations of Subtitle C of RCRA. EPA is also providing the State with notice that EPA may take appropriate enforcement action if the facility does not resolve the violations within the time specified above, and the State does not take appropriate enforcement action. The State of California may notify EPA of its intent to assume or decline responsibility to take such action to resolve the referenced violations.

EPA reserves the right to take further enforcement action as it deems appropriate. However, your response to this letter will be considered in determining the need for further enforcement action. Violations of Subtitle C of RCRA such as those listed in the enclosed report may be punishable by civil and criminal actions, including penalties of up to \$27,500 per day for each violation as provided by Section 3008 of RCRA.


EPA routinely provides copies of investigation reports to state agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fourteen (14) calendar days from the date of this letter. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

Your response to this Warning Letter, due within 30 calendar days from the date of this letter, shall be mailed to:

Robin Holloway, WST-3
RCRA Enforcement Office
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

If you have questions related to technical aspects of the investigation report or this letter, please contact Robin Holloway at (415) 972-3305.

Sincerely,

A handwritten signature in black ink, appearing to read "Frances Schultz". The signature is fluid and cursive, with the first name "Frances" written in a larger, more prominent script than the last name "Schultz".

Frances Schultz, Manager
RCRA Enforcement Office

Enclosure
cc w/o enclosure:

Charles McLaughlin, Branch Chief, State Regulatory Programs Division
Department of Toxic Substances Control
8800 Cal Center Dr.
Sacramento, CA 95828-3200

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

OFFICE OF THE ATTORNEY GENERAL
 1000 ...

Postage	\$
Certified Fee	
Return Receipt Fee	
(Endorsement Required)	
Restricted Delivery Fee	
(Endorsement Required)	
Total Postage & Fees	\$

Postmark
 Here

Sent To *Reynolds Law Office*
 Street, Apt. No. or PO Box No. *P.O. Box 5114*
 City, State, Zip+4 *Memphis, TN 38101*

7001 0360 0000 3639 6631

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Carl Chinkenbeard, PE
Engineering Specialist
Pechiney Cast Plate
P.O. Box 58447
Vernon, CA 90058

2. Article Number (Copy from service label)

7001 0360 0000 3639 6631

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

Leonardo Flores

B. Date of Delivery

7/4/03

C. Signature

[Signature]

☐ Agent☐ AddresseeD. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☒ No

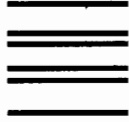
3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Robin Holloway (rust-3)
U.S. EPA
75 Hawthorne St.
San Francisco CA 94105

34105+3920



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Certified Mail No.
Certified Receipt Requested

In reply, refer to WST-3

WARNING LETTER

Earl Clinkenbeard, PE
Engineering Specialist
Pechiney Cast Plate
P.O. Box 58447
Vernon, CA 90058

Dear Mr. Clinkenbeard:

On March 26-27, 2003, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency ("EPA") at Pechiney Cast Plate, located at 3200 Fruitland Avenue, Vernon, California, EPA Identification Number CAR 000 052 142. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), as amended [42 U.S.C. 6927]. A copy of the investigation report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with RCRA regulations and potential violations of the California authorized program under RCRA Subtitle C. Any omissions in the report shall not be construed as a determination of compliance with all applicable regulations.

Pursuant to Section 3008 of RCRA [42 U.S.C. 6928] you are required to:

1. Submit a written Standard Operating Procedure that ensures that all containers that hold hazardous waste, both in satellite accumulation areas and 90-day storage areas, are labeled or marked clearly with the accumulation start date, the words "Hazardous Waste", the composition and physical state of the waste, the particular hazardous properties of the waste, and the name and address of the person producing the waste, as required by §66262.34(f). Certify that all hazardous waste containers at your facility are properly labeled.

MAIL CODE	WST-3	WST3	WST-3			
SURNAME	Holloway	Gf	Schultz			
DATE	5/15/03	5/16/03	6/27/03			

U.S. EPA CONCURRENCES

OFFICIAL FILE COPY

2. Certify that all containers of hazardous waste are kept closed, except when it is necessary to add or remove waste, as required by §66265.173(a).
3. Certify that the 55-gallon drum containing mineral spirits, paint, and water has been shipped offsite.

Your response must include a letter signed by a duly authorized official of your facility, certifying correction of the identified areas of noncompliance. Documentation of your return to compliance may consist of, among other things, photographs, manifests and revised records. Where compliance cannot be achieved within 30 days from the date of this letter, you must provide to EPA the reasons for the delay, a description of each corrective action planned and a schedule on which each corrective action will be taken.

By copy of this letter, EPA is providing the State of California with notice of the referenced violations of Subtitle C of RCRA. EPA is also providing the State with notice that EPA may take appropriate enforcement action if the facility does not resolve the violations within the time specified above, and the State does not take appropriate enforcement action. The State of California may notify EPA of its intent to assume or decline responsibility to take such action to resolve the referenced violations.

EPA reserves the right to take further enforcement action as it deems appropriate. However, your response to this letter will be considered in determining the need for further enforcement action. Violations of Subtitle C of RCRA such as those listed in the enclosed report may be punishable by civil and criminal actions, including penalties of up to \$27,500 per day for each violation as provided by Section 3008 of RCRA.

EPA routinely provides copies of investigation reports to state agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fourteen (14) calendar days from the date of this letter. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

Your response to this Warning Letter, due within 30 calendar days from the date of this letter, shall be mailed to:

Robin Holloway, WST-3
RCRA Enforcement Office
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

If you have questions related to technical aspects of the investigation report or this letter, please contact Robin Holloway at (415) 972-3305.

Sincerely,

Frances Schultz, Manager
RCRA Enforcement Office

Enclosure
cc w/o enclosure:

Charles McLaughlin, Branch Chief, State Regulatory Programs Division
Department of Toxic Substances Control
8800 Cal Center Dr.
Sacramento, CA 95828-3200